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23 UNITED STATES DISTRICT COURT

24 NORTHERN DISTRICT OF CALIFORNIA

25 SAN FRANCISCO DIVISION

26 SONOS, INC.,

27 Plaintiff,

28 vs.

GOOGLE LLC,

Defendant.

Case No. 3:20-cv-06754-WHA

Consolidated with Case No. 3:21-cv-07559-WHA

**DECLARATION OF JOCELYN MA IN
SUPPORT OF SONOS, INC.'S
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
SEALED (DKT. 734)**

I, Jocelyn Ma, declare and state as follows:

1. I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am an associate at Quinn Emanuel Urquhart & Sullivan LLP representing Google LLC (“Google”) in this matter. I have personal knowledge of the matters set forth in this Declaration, and if called as a witness I would testify competently to those matters.

2. I make this declaration in support of Sonos, Inc.’s (“Sonos”) Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed (“Administrative Motion”) (Dkt. 734) filed in connection with Sonos’s Brief Regarding IFTTT (“Sonos’s Brief”) (Dkt. 735). If called as a witness, I could and would testify competently to the information contained herein.

3. Google seeks an order sealing the materials as listed below:

Document	Portions Sonos Sought to Be Filed Under Seal	Portions Google Seeks to Be Filed Under Seal	Designating Party
Exhibit 1 to Caridis Declaration in Support of Sonos’s Brief (“Exhibit 1”)	Entire document	Portions outlined in red boxes	Google
Exhibit 4 to Caridis Declaration in Support of Sonos’s Brief (“Exhibit 4”)	Entire document	None	Google

4. I understand that this Court has analyzed sealing requests in connection with evidentiary matters pursuant to the “good cause” standard for non-dispositive motions. *See, e.g., Gearsource Holdings, LLC v. Google LLC*, No. 18-CV-03812-HSG, 2021 WL 1123630, at *2 (N.D. Cal. Feb. 24, 2021) (“Because Defendant’s motion *in limine* is not a dispositive motion, the Court applies the lower good cause standard.”). I further understand that courts have found materials which detail “sensitive financial and business information” and contain a company’s “sensitive information about [its] data, processes, systems, and policies” are appropriately sealed under this standard. *Skillz Platform Inc. v. AviaGames Inc.*, No. 21-CV-02436-BLF, 2022 WL 875654, at *2 (N.D. Cal. Mar. 24, 2022); *Free Range Content, Inc. v. Google Inc.*, No. 14-cv-02329-BLF, Dkt. No. 192, at 3-9 (N.D. Cal. May 3, 2017); *see also Trotsky v. Travelers Indem. Co.*, 2013 WL 12116153, at *8 (W.D. Wash.

1 May 8, 2013) (granting motion to seal as to “internal research results that disclose statistical coding
2 that is not publically [*sic*] available”).

3 5. I also understand that material that is confidential and could harm a litigant’s
4 competitive standing if disclosed may be sealed under the good cause standard. *See, e.g., Skillz*
5 *Platform Inc. v. AviaGames Inc.*, No. 21-CV-02436-BLF, 2022 WL 875654, at *2 (N.D. Cal. Mar. 24,
6 2022) (finding “good cause to file the documents and portions of documents at issue under seal given
7 the sensitive financial and business information they contain”); *Dugan v. Lloyds TSB Bank, PLC*, No.
8 12-CV-02549-WHA NJV, 2013 WL 1435223, at *2 (N.D. Cal. Apr. 9, 2013) (“There may be ‘good
9 cause’ to seal records that are privileged, contain trade secrets, contain confidential research,
10 development or commercial information, or if disclosure of the information might harm a litigant’s
11 competitive standing.”).

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